



**DEPARTMENT OF THE TREASURY**  
**INTERNAL REVENUE SERVICE**  
**WASHINGTON, D.C. 20224**

MEMORANDUM FOR: Steven Musher  
Associate Chief Counsel (International)

FROM: Matthew W. Frank, APA Program Director

DATE: April 10, 2008

SUBJECT: APA Quarterly Report for FY 2008,  
Second Quarter Ending 03/31/08

---

The following are the APA Program's results for the second quarter of FY 2008 ("Q2").

**APAs Completed**

The APA Program completed 9 APA matters in Q2, consisting of 5 unilateral APAs and 4 bilateral APAs.

**Negotiating-Position Papers**

The APA Program completed 6 bilateral negotiating position papers in Q2.

**Annual Reports**

The APA Program completed its review of and closed 80 annual reports in Q2.

**New Matters**

The APA Program received 20 new APA matters in Q2, consisting of 12 bilateral matters and 8 unilateral APA matters.

**APA Inventory**

The APA Program has an ending inventory of 260 open matters.<sup>1</sup> This consists of 218 bilateral and 42 unilateral matters.<sup>2</sup>

Attached for your information is the APA issuance report and open inventory reports as of March 31, 2008. Please contact me at (202) 435-5222 if any additional information is required.

Respectfully submitted,

---

Matthew W. Frank  
APA Program Director

Attachments

cc: LMSB Commissioner  
Director, International  
National Director of Appeals  
LMSB Division Counsel

- 
1. This equals beginning Q2 inventory of 249 matters, plus 20 receipts, less 9 closures ( $249 + 20 - 9 = 260$ ).
  2. The 260 open matters include 19 pending dollar filings (10 bilateral and 9 unilateral). Thus
    - The APA Program has an inventory of 241 active cases, i.e., 260 open matters less 19 pending dollar filings.
    - The 241 active cases consist of 208 bilateral cases (218 total bilateral matters less 10 pending bilateral dollar filings) and 33 unilateral cases (42 total unilateral matters less 9 pending unilateral dollar filings).
    - The APA Program has forwarded 114 of the 208 active bilateral matters to Competent Authority. Thus, the APA Program has a current working inventory of 127 cases, consisting of 94 bilateral (208 active bilateral cases less 114 forwarded to Competent Authority) and 33 active unilateral cases.